

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor,

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CAROL L. KAMENSTEIN, individually and in
her capacity as joint tenant,

DAVID R. KAMENSTEIN, individually and in his
capacity as joint tenant,

SLOAN G. KAMENSTEIN, and

TRACY D. KAMENSTEIN,

Defendants.

Adv. Pro. No. 10-04469 (CGM)

PROPOSED ORDER TO SHOW CAUSE

THIS MATTER having come before the Court's attention through the Application of Defendants, Carol L. Kamenstein, individually and in her capacity as joint tenant, David R. Kamenstein, individually and in his capacity as joint tenant, Sloan G. Kamenstein and Tracy D. Kamenstein (collectively, "Defendants") seeking relief under Rule 9077-1(a) of the Local Bankruptcy Rules for the Southern District of New York, for an order authorizing the adjournment of certain dates;

UPON REVIEW AND CONSIDERATION of the supporting Declaration of Helen Davis Chaitman, Esq., the Memorandum of Law in Support of Defendants' Motion for an Adjournment and all of the pleadings and other papers filed and submitted in connection with the application;

Now, therefore, IT IS HEREBY:

ORDERED that cause must be shown before this Court, the United States Bankruptcy Court for the Southern District of New York, 355 Main Street Poughkeepsie, New York 12601, at a telephonic hearing, pursuant to this Court's General Order M-543, on the ____ day of ____ 2020 at ____ a.m. as to why the Court should not issue an order granting Defendants' motion for an adjournment as follows:

1. That the date on which the Trustee shall provide Defendants a draft Joint Pre-Trial Order is hereby adjourned from on or before November 18, 2020 to December 30, 2021; and

2. That the date on which Defendants shall provide the Trustee with comments and/or responses to the draft Joint Pre-Trial Order is hereby adjourned from on or before December 18, 2020 to January 29, 2021; and

3. That the date on which the parties shall exchange exhibits and deposition designations is hereby adjourned from on or before January 8, 2021 to February 19, 2021; and

4. That the date on which the parties shall exchange objections to exhibits and deposition

designations is hereby adjourned from on or before January 15, 2021 to February 26, 2021; and

5. That the date on which the parties shall submit a final Joint Pre-Trial Order to Chambers is hereby adjourned from on or before January 20, 2021 to March 3, 2021; and

6. That the date on which the final pre-trial conference in this matter shall commence is hereby adjourned from on January 27, 2021 at 1:00 p.m. to March 10, 2021 at 1:00 p.m.; and

7. That to the extent the parties intend to file motions for summary judgment, Defendants shall file and serve their motion for summary judgment on or before January 6, 2021; and

8. That the Trustee shall file and serve his opposition to Defendants' motion for summary judgment and cross-motion for summary judgment on or before February 3, 2021; and

9. That Defendants shall file their reply in support of their motion for summary judgment and opposition to the Trustee's cross-motion due or before February 17, 2021; and

10. That the Trustee shall file his reply to Defendants' opposition to his cross-motion on or before March 3, 2021; and

11. That the Parties shall appear for a hearing on the motions on March 10, 2021 at 1:00 p.m.